



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

11/28/2011

Certified Mail

Joe Shaw
Day-Glo Color Corp.
Day-Glo Color Corp.
4515 Saint Clair Ave.
Cleveland, OH 44103

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1318006552
Permit Number: P0108711
Permit Type: Administrative Modification
County: Cuyahoga

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Cleveland Division of Air Quality. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
CDAQ; Pennsylvania; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Day-Glo Color Corp.**

Facility ID: 1318006552
Permit Number: P0108711
Permit Type: Administrative Modification
Issued: 11/28/2011
Effective: 11/28/2011



Division of Air Pollution Control
Permit-to-Install
for
Day-Glo Color Corp.

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Authorization

Facility ID: 1318006552

Facility Description: manufacture of fluorescent pigments, ink bases, and dyes

Application Number(s): M0001379

Permit Number: P0108711

Permit Description: Administrative modification of PTI 13-04335 (issued 2/5/2008) to address two typographical errors. Day-Glo would like to correct (change) the venturi pressure drop limitation from 7" to 5" for P007 and P031 - P035. The 7" pressure drop limitation is a typographical error contained in the original permit. The second typographical error is in regard to the wording of "rate of recirculation". This parameter has always been measured and reported as "fresh water intake rate".

Permit Type: Administrative Modification

Permit Fee: \$0.00

Issue Date: 11/28/2011

Effective Date: 11/28/2011

This document constitutes issuance to:

Day-Glo Color Corp.
Day-Glo Color Corp.
4515 Saint Clair Ave.
Cleveland, OH 44103

of a Permit-to-Install for the emissions unit(s) identified on the following page.

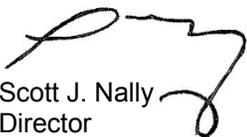
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108711

Permit Description: Administrative modification of PTI 13-04335 (issued 2/5/2008) to address two typographical errors. Day-Glo would like to correct (change) the venturi pressure drop limitation from 7" to 5" for P007 and P031 - P035. The 7" pressure drop limitation is a typographical error contained in the original permit. The second typographical error is in regard to the wording of "rate of recirculation". This parameter has always been measured and reported as "fresh water intake rate".

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: Plant 2 - Curing Ovens

Table with 2 columns: Emissions Unit ID and details (Company Equipment ID, Superseded Permit Number, General Permit Category and Type). Rows include units P007, P031, P032, P033, P034, and P035.

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Cleveland Division of Air Quality.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Cleveland Division of Air Quality. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Cleveland Division of Air Quality every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Cleveland Division of Air Quality in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Cleveland Division of Air Quality concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Cleveland Division of Air Quality.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have

been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Cleveland Division of Air Quality. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. The emissions of hazardous air pollutants (HAPs), as defined in Section 112(b) of Title III of the Clean Air Act, from all the emissions units at this facility, shall not exceed 9.7 TPY for any individual HAP, as a rolling, 12-month summation, and 24.7 TPY for any combination of HAPs, as a rolling, 12-month summation.

[Authority for term: OAC rule 3745-77-07(A)(3)]

3. Substantive amounts of HAPs are emitted from the following non-insignificant emissions units:

a) P001, P002, P007, P008, P009, P024, P026, P027, P030 P031, P032, P033, P034, and P035 (formaldehyde);

b) P003 (xylene and toluene); and

c) P021 (methanol).

HAPs will also be emitted at negligible levels from the following insignificant emissions units:

d) P022 (methanol);

e) T043 (methanol);

f) T044 (methanol); and

g) N001 (metals, CDD/CDF, hydrochloric acid)

[Authority for term: OAC rule 3745-77-07(A)(3)]

4. The permittee shall use calculation methodologies to estimate HAP emissions for this facility. The following calculations shall be performed monthly:

a) The HAP emissions from each of non-insignificant emissions units P001, P002, P003 P007, P008, P009, P021, P031, P032, P033, P034, and P035 shall be calculated as follows:

$\text{lb product/day} * \text{lb HAP emitted/lb product (from the latest emissions test for the worst case product)} * \text{days of operation/month} * \text{ton/2000 lb} = \text{tons of HAP (formaldehyde)/month}$

The HAP emission factor determined from the most recent diagnostic testing shall be used to determine the HAP emissions from the above listed sources.

b) The HAP emissions from non-insignificant emissions unit P003 shall be calculated as follows:

$\text{tons production/month} * \text{weight fraction of organic solvent in product} * \text{weight fraction of HAPs in solvent} * 0.02 \text{ evaporative loss} = \text{tons of HAPs (xylene and toluene)/month}$

The above calculation is based on US EPA publication AP-42, Section 6.4.1, Paint Manufacturing: "About 1 or 2 percent of the solvent is lost even under well-controlled conditions." DayGlo conservatively assumed the high end of this range - 2 percent evaporative loss.

- c) The HAP emissions from non-insignificant emissions unit P021 shall be calculated as follows:
- $$\text{dye batches filtered/month} * \text{emission factor, lb methanol/batch} * \text{ton/2000 lb} = \text{tons of HAP (methanol)/month}$$

Performance testing of this unit conducted on 1/5/2001 determined that the unit's condenser achieved an average control efficiency of 97.78% for methanol. Subsequent testing conducted on 4/27/2005 through 4/28/2005 and 12/9/2008 through 12/10/2008 determined average hourly methanol emissions to be 0.47 lbs per hour and 0.70 lbs per hour (respectively). This unit is not subject to an OC emission limitation or control measure, however OC emissions (including but not limited to methanol) shall be considered when determining compliance with the facility-wide HAP limitation referenced in the facility-wide terms and conditions section of this permit.

- d) The HAP emissions from bulk liquid storage of raw materials (insignificant emissions units P022, T043, and T044) shall be calculated using the latest version of the US EPA, TANKS program or equivalent calculations from US EPA publication AP-42, Chapter 7.

- e) The HAP emissions from insignificant emission unit N001 shall be calculated as follows:

$$\text{tons trash combusted/month} * \text{emission factor, lb HAP/ton trash} = \text{tons of HAP/month}$$

The emission factor for each of the various HAPs (metals, CDD/CDF, and hydrochloric acid) shall be taken from US EPA publication AP-42, Table 2.1-9 (Refuse Combustion).

The permittee shall maintain records of all the above-mentioned monthly calculations.

5. The permittee shall keep records for each month of the following information:

- a) Diagnostic and compliance emission test data (including HAP emission factors) and the hours of operation for emissions units (P001, P007, P008, P009, P024, P031, P032, P033, P034, and P035).
- b) Production quantity, in pounds or tons, and batch records indicating solvent and HAPs contents for emissions unit P003.
- c) Diagnostic and compliance emission test data (lb methanol/batch) and number of dye batches filtered for emissions unit P021.
- d) The methanol throughput, in gallons, for emissions units P022, T043, and T044.

- e) Quantity of trash combusted, in pounds or tons, for emissions unit N001.

[Authority for term: OAC rule 3745-77-07(A)(3)]

- 6. The permittee shall keep monthly records for the entire facility of the following information:

- a) The total facility-wide emissions (and associated calculations) for each individual HAP, in pounds or tons per year (calculated by summing the individual HAP emission rates from all the emissions units at the facility; see B.9. for a current list of emissions units).
- b) The total facility-wide emissions (and associated calculations) for all combined HAPs, in pounds or tons per year (calculated by summing all the HAPs emission rates from all the emissions units at the facility; see B.9. for a current list of emissions units).
- c) The rolling, 12-month summation of the total individual HAP emissions rates for each HAP from all the emissions units at the facility (see B.9. for a current list of emissions units), in tons.
- d) The rolling, 12-month summation of the total combined HAPs emissions rates from all the emissions units at the facility (see B.9. for a current list of emissions units), in tons.

[Authority for term: OAC rule 3745-77-07(A)(3) and PTI# 13-04335]

- 7. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the Standard Terms and Conditions of this permit, of the following information:

- a) An identification of each month during which the rolling 12-month emissions rate (from the facility) for an individual HAP exceeded 9.7 tons, and the actual rolling, 12-month summation of each individual HAP emissions rate (see B.9. for a current list of emissions units) for each such month.
- b) An identification of each month during which the rolling, 12-month emissions rate (from the facility) for combined HAPs exceeded 24.7 tons, and the actual rolling, 12-month summation of the combined HAPs emissions rates (see B.9. for a current list of emissions units) for each such month.

[Authority for term: OAC rule 3745-77-07(A)(3) and PTI# 13-04335]

- 8. The permittee shall submit annual reports that summarize the annual emissions of each individual HAP and the combined emissions of all the HAPs for the facility (see B.9. for a current list of emissions units). These reports shall cover the previous calendar year and shall be submitted by January 31 of each year.

- 9. Current emissions units at this facility that emit HAPs include P001, P002, P003, P007, P008, P009, P021, P022, P024, P026, P027, P030, P031, P032, P033, P034, P035, T043, T044, N001, and any future emissions units.

- a) [Authority for term: OAC rule 3745-77-07(A)(3) and PTI# 13-04335]

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Plant 2 - Curing Ovens: P007,P031,P032,P033,P034,P035,

EU ID	Operations, Property and/or Equipment Description
P007	Curing Oven #1 - Electrically heated, thermoset pigment, Grieve tray curing oven directly vented to a venturi scrubber and a tray tower scrubber, in series.
P031	Curing Oven #2 - Electrically heated, thermoset pigment, Grieve tray curing oven directly vented to a venturi scrubber and a tray tower scrubber, in series.
P032	Curing Oven #3 - Electrically heated, thermoset pigment, Grieve tray curing oven directly vented to a venturi scrubber and a tray tower scrubber, in series.
P033	Curing Oven #4 - Electrically heated, thermoset pigment, Grieve tray curing oven directly vented to a venturi scrubber and a tray tower scrubber, in series.
P034	Curing Oven #5 - Electrically heated, thermoset pigment, Grieve tray curing oven directly vented to a venturi scrubber and a tray tower scrubber, in series.
P035	Curing Oven #6 - Electrically heated, thermoset pigment, Grieve tray curing oven directly vented to a venturi scrubber and a tray tower scrubber, in series.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (Terms in this permit will supersede those identified in PTI 13-04335 issued final on 2/5/2008 for emission units P007 and P031 through P035.)	Particulate emissions (PE) shall not exceed 1.2 pounds per hour and 5.26 tons per year (TPY) combined for P007, P031, P032, P033, P034, and P035. See b)(2)a. below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) from the tray tower scrubber stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11(B)(1)	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-21-07(M)(4)	The emission limitations established by this rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The emissions of OC from the six curing ovens, combined, shall not exceed 7.5 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The six curing ovens at Day-Glo Color Corporation are P007, P031, P032, P033, P034, and P035. This emission limitation is more stringent than the emission limitation established pursuant to OAC rule 3745-21-07(M)(4).

c) Operational Restrictions

- (1) The pressure drop across the venturi scrubber shall be maintained at a minimum of 5 inches of water column when the emissions unit is in operation. After each round of emission testing that demonstrates that the emissions unit was operating in compliance with the applicable requirements, the permittee may establish a new, minimum pressure drop based upon the operation of the scrubber during the emission test.
- (2) The scrubber liquor recirculation rate for the venturi scrubber shall be continuously maintained at a value of not less than 70 gallons per minute at all times while the emissions unit is in operation. After each round of emission testing that demonstrates that the emissions unit was operating in compliance with the applicable requirements, the permittee may establish a new, minimum scrubber liquor recirculation rate based upon the operation of the scrubber during the emission test.
- (3) The fresh water intake rate to the tray tower scrubber shall be maintained at a value of not less than 10 gallons per minute (gpm) at all times while the emissions unit is in operation. After each round of emissions testing that demonstrates that the emissions unit was operating in compliance with the applicable requirements, the permittee may establish a new fresh water intake rate based upon the operation of the scrubber during the emission test.
- (4) The pH of the scrubber liquor in the tray tower scrubber shall be maintained at a value of not less than 10.0 when the emissions unit is in operation. After each round of emission testing that demonstrates that the emissions unit was operating in compliance with the applicable requirements, the permittee may establish a new, minimum pH value for the scrubber liquor based upon the operation of the scrubber during the emission test.

- (5) This emissions unit shall be maintained under negative pressure when in operation.
- (6) The permittee shall follow the Ohio EPA-approved (March 28, 1991 letter from Mr. Thomas Rigo) operator training program for the proper operation and maintenance of the control equipment, as described in the March 28, 1991 Director's Final Findings & Orders, or such alternative program approved by the Cleveland Division of Air Quality (CDAQ) that is consistent with the Final Findings & Orders.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the venturi scrubber, as well as the scrubber liquor recirculation flow rate, while the emissions unit is in operation. The monitoring devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the pressure drop across the scrubber, in inches of water column, twice per shift (not less than 4 hours apart);
- b. the scrubber liquor recirculation flow rate, in gallons per minute, twice per shift (not less than 4 hours apart); and
- c. the down times for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

- (2) The permittee shall properly operate and maintain equipment to continuously monitor the tray tower fresh water intake rate, while the emissions unit is in operation. The monitoring devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the fresh water intake rate, in gallons per minute, twice per shift (not less than 4 hours apart); and
- b. the down times for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

- (3) The permittee shall properly operate and maintain equipment to continuously monitor the pH of the tray tower scrubber liquor, while the emissions unit is in operation. The pH monitor shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall collect and record the following information each day:

- a. the pH of the scrubber liquor, twice per shift (not less than 4 hours apart); and
- b. the down times for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

- (4) The permittee shall collect and record the following information each day for emissions units P007, P031, P032, P033, P034, and P035 :
- a. the name and identification of each product produced;
 - b. the total amount of product produced, in pounds; and
 - c. the amount of OC emissions for all six curing ovens, calculated using the following equation:

$$(0.0032777 \text{ lbs OC/lbs product}) \times (\text{total lbs product/day}) = \text{lbs OC emissions/day}$$

(The above emission factor was determined from stack testing for a worst case product. This stack test was performed in October of 2007. The emission factor was also confirmed with a stack test performed in October of 2006.)

- (5) The permittee shall collect and record the following information each month for emissions units P007, P031, P032, P033, P034, and P035:
- a. the amount of OC emissions, in tons (Σ 4.c/2,000); and
 - b. the rolling, 12-month summation of OC emissions, in tons.

- (6) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the scrubber stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. the total duration of any visible emissions incident; and
- c. any corrective actions taken to eliminate the visible emissions.

Notwithstanding the frequency of reporting requirements specified below, the permittee may reduce the frequency of visual observations from daily to weekly for this emissions unit if the following conditions are met:

- a. for 1 full quarter the facility's visual observations indicate no visible emissions; and
- b. the permittee continues to comply with all the record keeping and monitoring requirements specified above.

The permittee shall revert to readings of daily if any visible emissions are observed.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the wet scrubber serving this

emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland Division of Air Quality (CDAQ) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following venturi scrubber parameters were not maintained within the required levels:
 - a. the static pressure drop across the scrubber; and
 - b. the scrubber liquor recirculation flow rate.
 - (3) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following tray tower scrubber parameters were not maintained within the required levels:
 - a. the scrubber fresh water intake rate; and
 - b. the pH of the scrubber liquor.
 - (4) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for OC.
 - (5) The permittee shall submit quarterly deviation reports that identify each day during which the emissions unit was in operation and the capture (collection) system and/or control device were not in operation.
 - (6) The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.
 - (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Particulate emissions (PE) shall not exceed 1.2 pounds per hour combined for P007, P031, P032, P033, P034, and P035.

Applicable Compliance Method:

If required, compliance with the mass emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B).

b. Emission Limitation:

PE shall not exceed 5.26 tons combined for P007, P031, P032, P033, P034, and P035.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

c. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average (stack).

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

d. Emission Limitation:

OC emissions shall not exceed 7.5 tons per rolling, 12-month period, for the list of emissions units in b)(2)a.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in d)(4) and d)(5).

g) Miscellaneous Requirements

(1) None.